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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

17 K.A.,

18 Plaintiff,

20 v.

21 MINDGEEK S.A.R.L., et al.,  
22 Defendants.

Case No. 2:21-CV-04786-WLH-ADS  
Hon. Wesley L. Hsu

**DECLARATION OF LAUREN  
TABAKSBLAT IN SUPPORT OF  
STIPULATION TO CONTINUE  
DEADLINE FOR PLAINTIFF TO  
FILE THIRD AMENDED  
COMPLAINT AND TO SET  
MOTION BRIEFING SCHEDULE**

1 I, Lauren Tabaksblat, declare and state as follows:

2 1. I am a partner at Brithem LLP and have been admitted *pro hac vice* to  
3 practice before this Court. I am counsel for Plaintiff K.A. in the above-referenced  
4 matter. I submit this declaration in support of the *Stipulation to Continue Deadline*  
5 *for Plaintiff to File Third Amended Complaint and to Set Motion Briefing Schedule*  
6 filed by Plaintiff and Defendants Visa Inc. (“Visa”), Colbeck Capital Management,  
7 LLC, CB Media Ventures LLC, CB Agency Services, LLC, and CB Participations  
8 SPV, LLC (the “Colbeck Defendants”), Redwood Capital Management, LLC,  
9 Redwood Master Fund, Ltd., Redwood Opportunity Master Fund, Ltd., Manuel  
10 2018, LLC, Ginogerum, LLC, and White-Hathaway Opportunity Fund, LLC (the  
11 “Redwood Defendants”), MG Freesites Ltd, MG Premium Ltd, MindGeek USA  
12 Incorporated, MG Global Entertainment Inc., and 9219-1568 Quebec Inc. (the  
13 “MindGeek Defendants”).

14 2. On November 6, 2025, the Court entered an order (ECF No. 618)  
15 granting in part and denying in part the MindGeek Defendants' Omnibus Motion to  
16 Dismiss.

17 3. In light of the Court’s orders last week in this action (ECF No. 166)  
18 and the other thirteen actions, and the similar stipulation filed in the case captioned  
19 *Fleites v. MindGeek, S.à.r.l., et al.*, No. 2:21-cv-04920-WLH-ADS (C.D. Cal. June  
20 17, 2021), the Parties conferred on November 11-12, 2025 to align the schedules in  
21 these actions. The Parties agree to the following schedule:

- 22 • Plaintiff shall file their Amended Complaint, if any, no later than  
23 December 15, 2025;
- 24 • If Plaintiff files an Amended Complaint, Defendants shall file their  
25 Motions to Dismiss, or otherwise respond to, the Amended Complaint  
26 no later than January 30, 2026;
- 27 • Plaintiff shall file their Opposition to Defendants’ Motions to Dismiss  
28 no later than February 27, 2026; and

